

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALICE CREACH AND LUTHER CREACH,  
H/W

vs.

FASHION BUG OF WALNUTPORT, INC. d/b/a  
FASHION BUG; ARMO, INC.; BLACKSHIRE  
CONSTRUCTION, INC.; RD MANAGEMENT  
CORP.; ECKERD'S OF PENNSYLVANIA,  
INC. d/b/a ECKERD STORE NUMBER 5849

Civil Action No. 02CV03782 (RBS)

**REPLY OF DEFENDANT, ECKERD CORPORATION D/B/A ECKERD DRUGS, TO  
DEFENDANT, RD MANAGEMENT CORP.'S, NEW MATTER AND CROSS-CLAIMS**

Defendant, Eckerd Corporation d/b/a Eckerd Drugs (incorrectly designated as Eckerd's of Pennsylvania, Inc. d/b/a Eckerd Store Number 5849), by and through its attorneys, Mintzer, Sarowitz, Zeris, Ledva & Meyers, hereby replies to the defendant, RD Management Corp.'s, New Matter and Cross-Claims as follows:

95. Answering defendant adopts and incorporates by reference its Answer to Plaintiffs' Complaint as fully as though same were set forth at length herein.

96. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no response is required. Strict proof thereof is demanded at the time of trial.

97. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no response is required. Strict proof thereof is demanded at the time of trial.

98. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no response is required. Strict proof thereof is demanded at the time of trial.

WHEREFORE, defendant, Eckerd Corporation d/b/a Eckerd Drugs, demands judgment in its favor.

MINTZER, SAROWITZ, ZERIS, LEDVA & MEYERS

BY: \_\_\_\_\_  
LAWRENCE S. SAROWITZ, ESQUIRE  
Attorney for Defendant(s): ECKERD CORPORATION  
D/B/A ECKERD DRUGS  
1528 Walnut Street, 22<sup>nd</sup> Floor  
Philadelphia, PA 19102  
(215) 735-7200 / File No. 3770.0024

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**PROOF OF SERVICE**

I hereby certify that on July 22, 2002, I duly served a true and correct copy of the foregoing REPLY OF DEFENDANT, ECKERD CORPORATION D/B/A ECKERD DRUGS, TO DEFENDANT, RD MANAGEMENT CORP.'S, NEW MATTER AND CROSS-CLAIMS on the following named counsel via first class mail, postage prepaid:

Shari L. Frankfurt, Esquire  
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MINTZER, SAROWITZ, ZERIS, LEDVA & MEYERS

BY: \_\_\_\_\_

LAWRENCE S. SAROWITZ, ESQUIRE

Attorney for Defendant(s): ECKERD CORPORATION

D/B/A ECKERD DRUGS (incorrectly designated as

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